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December 19, 2002

Via Hand Delivery

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: ***Ex Parte Presentation:***
IB Docket No. 01-185;
File No. SAT-ASG-20010302-00017 et al.;
File No. SES-ASG-20010116-00099 et al.

Dear Ms. Dortch:

This letter is written to correct the record with respect to certain statements made by Mobile Satellite Ventures LP in its November 4, 2002 submission entitled "Co-Channel Interference to Inmarsat-4 Using Example Spot Beam Pattern Provided by Inmarsat."

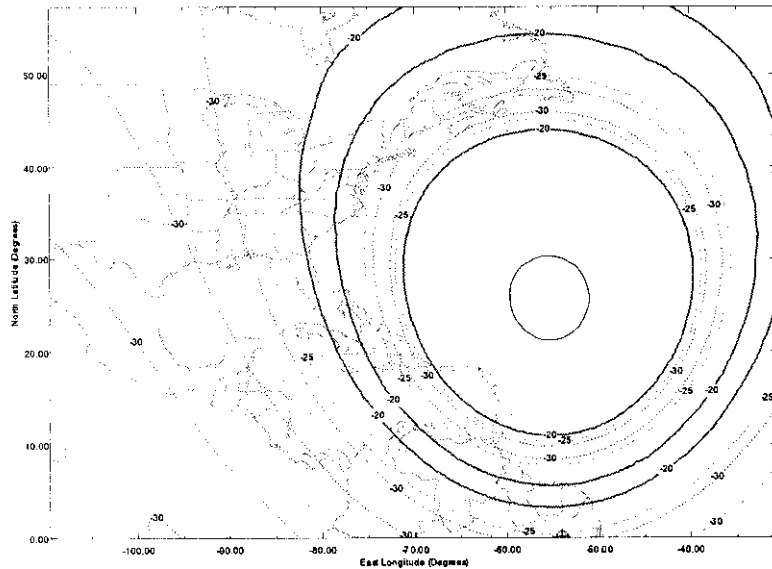
As an initial matter, this new MSV submission is essentially a repackaging of MSV's earlier analysis about the impact of ATC on Inmarsat's spacecraft. Throughout this proceeding, including the analyses listed on the attached page, Inmarsat has disagreed with many of the factors underlying the MSV analysis, including (i) assumptions about signal blockage toward the Inmarsat satellites, (ii) use of factors for voice activity and vocoders in a network that would likely include data communications, (iii) polarization isolation, (iv) appropriate factors for power control, and (v) the level of frequency reuse on the next-generation MSV spacecraft. These differences are summarized in the ***exparte*** presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 *et al.* (filed February 26, 2002), and in "MSV is Unable to Operate ATC Without Using Additional Spectrum Beyond That Used for Its MSS System," ***exparte*** presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 *et al.* (filed May 21, 2002).

MSV's analysis is based on the same assumptions as before, which Inmarsat has shown are wrong. Nothing in the November 4 MSV analysis alters Inmarsat's previous demonstration that MSV's proposed ATC system can be expected to cause a significantly greater increase in thermal noise level (co-channel A TIT) into the Inmarsat-4 spacecraft than Inmarsat expects to receive from MSV's next generation satellite system. See "Quantification of Harmful Co-Channel L-Band Uplink Interference into Inmarsat-4 From MSV ATC Uses, Versus MSV Mobile Earth Terminal Uses," ***exparte*** presentation of Inmarsat, IB Docket No. 01-185,

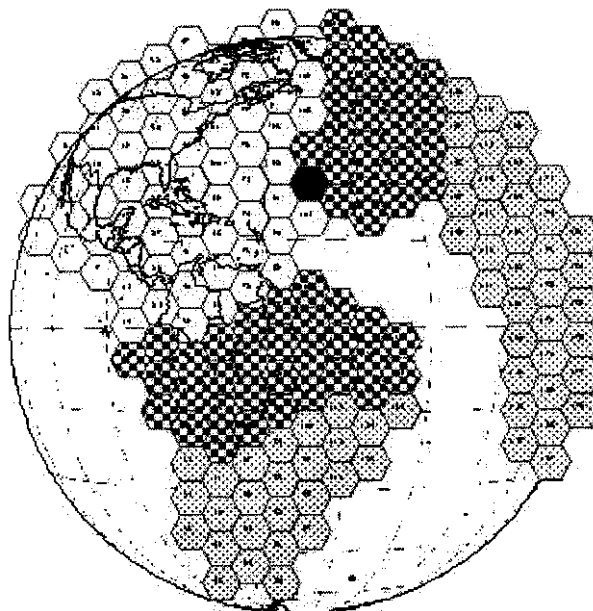
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File No. SAT-ASG-20010302-00017 *et al.* (filed May 10, 2002); “Inmarsat’s Reply to the Further Technical Analysis’ of Mobile Satellite Ventures, dated July 29, 2002,” *ex parte* presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 *et al.* (filed September 9, 2002)

MSV is simply wrong when it asserts that Inmarsat’s analysis in “Inmarsat’s Reply to the ‘Further Technical Analysis’ of Mobile Satellite Ventures” is based on a beam in which Inmarsat is not able to share spectrum with MSV. Figure 1 of that analysis, reproduced below, depicts beam 106 on Inmarsat-4, not beam 91 as MSV asserts.



Depicted below as a black hexagon in the middle of the Atlantic Ocean, beam 106 is one of the many beams on Inmarsat-4 on which Inmarsat expects to be able to share spectrum with MSV in the absence of ATC. The other such beams that can share spectrum with MSV are depicted with a dotted or checkerboard pattern in the diagram below.



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In short, Inmarsat's sample beam pattern and its analysis in "Inmarsat's Reply to the 'Further Technical Analysis' of Mobile Satellite Ventures" is fully consistent with Inmarsat's representations in its other filings in this proceeding, including the September 12, 2002 *ex parte* presentation of Inmarsat.

An original and five copies are enclosed,

Respectfully submitted,


John P. Janka

Enclosures

cc:

Bryan Tramont
John Branscome
Paul Margie
Sam Feder
Barry Ohlson
Ed Thomas
Bruce Franca
Rick Engelman
Chris Murphy
Breck Blalock
Ron Repasi
Paul Locke
Trey Hanbury

Inmarsat Technical Analyses on ATC

1. ***Comments of Inmarsat Venturesplc***, IB Docket No. 01-185 (filed October 19, 2001), and ***Technical Annex*** thereto
2. ***Reply Comments of Inmarsat Venturesplc***, IB Docket No. 01-185 (filed November 13, 2001), and ***Supplemental Technical Annex*** thereto
3. ***Exparte*** presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 ***et al.*** (filed February 26, 2002)
4. ***Further Comments of Inmarsat Venturesplc***, IB Docket No. 01-185 (filed March 22, 2002)
5. “Quantification of Harmful Co-Channel L-Band Uplink Interference into Inmarsat-4 From MSV ATC Uses, Versus MSV Mobile Earth Terminal Uses,” ***exparte*** presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 ***et al.*** (filed May 10, 2002)
6. “Inmarsat Response to MSV **Ex Parte** of March 28 Concerning ‘Monitoring and Control of Ancillary Terrestrial Emissions by MSV’s Space Segment,’” ***exparte*** presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 ***et al.*** (filed May 15, 2002)
7. “MSV is Unable to Operate ATC Without Using Additional Spectrum Beyond That Used for Its MSS System,” ***exparte*** presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 ***et al.*** (filed May 21, 2002)
8. “Inmarsat’s Reply to the ‘Further Technical Analysis’ of Mobile Satellite Ventures, dated July 29, 2002,” ***exparte*** presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 ***et al.*** (filed September 9, 2002)
9. ***Exparte*** presentation of Inmarsat, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 ***et al.*** (filed September 12, 2002)
10. ***Exparte*** presentation of Inmarsat to the Office of Engineering and Technology, IB Docket No. 01-185, File No. SAT-ASG-20010302-00017 ***et al.*** (filed November 6, 2002)